

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814

**REASON FOR THIS TRANSMITTAL**

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order
- ☒ Clarification Requested by One or More Counties
- ☒ Initiated by CDSS

March 8, 2006

ALL-COUNTY LETTER NO. 06-06

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: CLARIFICATION OF REPORTING METHODOLOGY FOR
COUNTY TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) WORK
PARTICIPATION RATE MONTHLY REPORT (WTW 30)

REFERENCE: THIS ALL-COUNTY LETTER (ACL) SUPERSEDES PRIOR ACLS AND ALL
COUNTY INFORMATION NOTICES (ACINS) ON THIS SAME SUBJECT,
INCLUDING ACL 99-85; ACIN I-16-01; AND ACL 03-17.

The purpose of this letter is to provide instructions that counties must follow in calculating a county work participation rate. These instructions will assist counties in modifying work activities to align with current Federal rules.

Changes to the WTW 30 instructions are being made to align the work activities with the Federal requirements. In addition, guidance is being provided on reporting actual hours of participation and requiring documentation of actual participation hours, which are mandated by Federal rules.

These changes are effective March 1, 2006. Counties must begin reporting aggregated data based on these changes by July 1, 2006. In addition, counties must begin reporting disaggregated data by October 1, 2006. The disaggregated data must be provided to the California Department of Social Services (CDSS) via a web-based tool that CDSS is developing and will be available soon that specifies the required data elements, or via a flat file that includes those same elements.

The changes, necessary to make the county work participation rate sample consistent with the Federal Q5i sample, will be made at a later date to be determined by CDSS. Counties will receive information about this change prior to its implementation.

In addition, CDSS will be conducting procedural reviews of and validating the data from the counties' data collection efforts related to calculation of county work participation rates. The

purpose of these reviews and data validation is to assist counties in improving the data collection efforts and to provide technical assistance when necessary.

The WTW 30 report form has not been substantively modified, but has been reformatted to be consistent with CDSS' data reporting form requirements.

- Attachment 1 provides clarification for reporting of actual hours of participation and the documentation necessary for reporting participation.
- Attachment 2 provides a camera-ready copy of the reformatted WTW 30.
- Attachment 3 provides the general instructions for completion of the WTW 30. These instructions have been modified for consistency with the Federal data reporting rules for purposes of calculating county work participation rates.
- Attachment 4 contains information on the county work participation rate sample or universe used to determine the county work participation rate.
- Attachment 5 provides the county work participation rate sample sizes for counties reporting data based on a sample.
- Attachment 6 provides the County Work Participation Rate Contact Sheet which will provide CDSS with information about how the county would like to receive its sample, who in the county is responsible for collection of the data for the calculation of the county work participation rate, and CDSS contact information for the county about the reporting of disaggregated data. This form should be completed and returned to CDSS within 30 days of the release of this ACL. Please update this form and send it to CDSS whenever any changes occur.

Additionally, Senate Bill (SB) 68, Chapter 78, Statutes of 2005 (Welfare and Institutions Code Section 15204.6) establishes a Pay for Performance Program to provide additional funding, contingent upon appropriation, for counties that meet the standards developed by the County Welfare Directors Association and CDSS. County work participation rate data, modified based on the provisions of the legislation, will be one of the data sources used in the Pay for Performance Program. A separate ACL on Pay for Performance will be released in the near future.

Any questions about the completion and submission of the WTW 30 Report form should be directed to Kathi Nakashima, Data Systems and Survey Design Bureau, at (916) 654-1207.

All County Letter No. 06-06
Page Three

Any questions about information in this letter, including the reporting of disaggregated data, should be directed to Lee Macias, Federal Data Reporting and Analysis Bureau (FDRAB), at (916) 657-3399, or Karen Kennedy, FDRAB, at (916) 657-3400.

Sincerely,

ERIC FUJII
Deputy Director
Administration Division

Attachments

c: CWDA
CSAC

County Work Participation Rate Report

General Information on Reporting Participation Based on Actual Hours and Documenting Participation

The following information provides additional clarification for counties in the reporting of actual hours as well as for documentation of participation.

ACTUAL HOURS OF PARTICIPATION

Federal data reporting instructions requires reporting and verification of actual hours of participation. Therefore, counties are required to report actual hours of participation in work related activities. However, scheduled work hours specified in a client's case plan may be deemed and reported as actual, provided the county has in place a means by which unexcused absences are reported timely to the county by work site supervisors and reported hours do not include any unexcused absences to the scheduled hours.

Example of Reporting Actual Hours Based on a "Negative" Reporting of Scheduled Hours: A county has an agreement (contract or MOU) with an off-site work activity provider to whom the county refers adults for participation in welfare-to-work activities. The agreement describes the structure of the activity referred clients will participate in, how the activity is supervised by the site managers, how rosters are maintained, how attendance is monitored, and how exceptions are reported to the county. Adults referred to this activity are scheduled for a certain number of hours per week, based upon the agreement between the county and the provider. Once referred clients begin participation, their scheduled hours can be reported as actual for the duration of their participation, provided:

- Records are maintained specifying when each client for whom hours were reported became enrolled and began participation and when (if) his or her participation ended (due to activity ending, no longer participating, etc.).
- Records are maintained showing how many hours per week each referred client was scheduled to participate in activities. If all participants in a given activity have the same schedule and participate for the same number of hours (e.g., a training class), the schedule and hours need only be documented in the agreement, provided case records for claimed participants show them referred and participating in that activity. On the other hand, if clients are assigned/enrolled for varying numbers of hours or scheduled times, each of their specific schedules and hours of expected weekly participation must be maintained and linked to individual client case records.
- There is a process in place by which the work activity provider reports all instances of unexcused absences or other forms of unexcused non-compliance (e.g., attendance but refusal to comply) by clients referred and scheduled for participation to the county. Records of each reported instance of non-compliance (including dates and number of hours of non-compliance with scheduled hours) are reported by the activity provider to the county within a reasonable time (a few days) of each instance such that the county can take any necessary action on the case.

Page Two

- Hours reported by the county for cases using a scheduled hours "negative" report system must account for all reported unexcused non-compliance, and the county must maintain this documentation.

PARTIAL PARTICIPATION

If a family receives assistance for only part of a month, an adult in the family must be engaged in work for the minimum average number of hours in each full week that the family receives assistance in that month to be counted as meeting the work participation requirement for that month. Aid granted retroactively for a new applicant for prior months may be excluded from participation rate calculations. The month in which assistance was granted to a new applicant must be counted in the calculation of the participation rate.

Example of Partial Participation:

If a family applies for assistance on March 25th and the county grants the application as of April 14th to cover assistance for March and April, the case would not be required to be included in the March report because the county has the option of not counting the month for work participation purposes because no aid was received in that month. The case could be included in the March report if the participation requirement was met for each full week of assistance received in March. However, the case must be included in the sample for the month of April because the family's application was granted before the end of April. Since the individual is aided for the entire month of April, he or she is required to meet the work requirements for the entire month.

DOCUMENTATION OF HOURS OF PARTICIPATION IN CASE FILE

Earned income reported under Quarterly Reporting/Prospective Budgeting for the data month that also corresponds to the sample month can continue to be used to document participation hours for employed persons. For all other months, additional contacts (such as with employer, off-site work activity provider, etc.) may be necessary by county staff to verify actual hours of participation unless all participation is verified in the recipient's case file on a monthly basis. The continued availability of current data and documentation of monthly participation in the individual's case file will continue to assist the State in meeting the Federal participation rate without additional efforts to secure verification of work participation hours.

Case records are required to be retained for three years or longer, if any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period. The retention period extends until completion of the action and resolution of all issues which arise from it, or the three-year period, whichever is later.

ADDITIONAL CLARIFICATIONS

- School Attendance:

Qualified students who are properly enrolled in secondary school or its equivalent and are satisfactorily attending classes may be reported as participating for 20 hours per week.

Page Three

Making satisfactory progress for school attendance is based on written provider standards and written county policy.

- Excused Absences:

Excused absences must be reported under the following conditions:

- Administrative requirements: Hours must be reported for a participant who is temporarily excused to attend approved meetings or to meet other requirements pertaining to administration of his or her public assistance case. These hours must be counted toward the activity in which he or she is regularly enrolled, provided the county can establish that the excused hours were appropriate for the needed participant's case action and that the participant attended/performed the action for which he or she was excused.
- Holidays: Hours must be reported for a participant who is excused from participation due to holidays observed by administrators and other participants of the activity in which the participant is enrolled, and which are generally observed within a local community.
- Illness: Hours must be reported for a participant who is temporarily excused from participation due to his or her illness or to attend to an illness involving a dependent, provided the circumstances meet standards generally applicable to all participants of the program in which the participant is enrolled (or written county policy) and the participant meets any notification request requirements of the program, the policies for which are generally applicable to all participants.
- Job Interviews: Hours must be reported for participants excused from activity attendance (as consistent with written county policy) to attend a bona-fide job interview. These excused hours may be reported as hours participating in the excused activity and not as "job search" hours, provided they are related directly to a specific job interview. Any excused hours used for generic job search (not directly pertaining to pursuing a specific, bona-fide job opportunity) may only be reported as "job search" participation, subject to the relevant limitations.

As a reminder, Manual of Policies and Procedures (MPP) Section 11-501.3 requires that, for those areas of the CalWORKs program in which counties have discretion to adopt specific standards that affect a recipient's eligibility, grant amount, and welfare-to-work activities, including supportive services, policies and procedures must be in writing and be made available to the public upon request. Counties have discretion in some aspects of determining and reporting participation hours, including, e.g., whether to use a negative reporting process and the elements of the process, as well as standards related to excused absences and school attendance as specified above. Under MPP 11-501.3, counties must adopt written policies in these areas.

COUNTY TANF WORK PARTICIPATION RATE MONTHLY REPORT

SEND ONE COPY TO:

California Department of Social Services
Data Systems and Survey Design Bureau, M.S. 9-081
P.O. Box 944243
Sacramento, CA 94244-2430
FAX: (916) 657-2074

COUNTY	REPORT MONTH AND YEAR		
COUNTY TANF WORK PARTICIPATION RATE			
1. All Families meeting work participation requirements (numerator).....	1		
2. All Families not excluded from participation (denominator).....	2		
3. Monthly TANF work participation rate (Item 1 divided by Item 2).....	3		%
<p>The above data is reported on (check one) <input type="checkbox"/> All Cases <input type="checkbox"/> A Sample of Cases</p>			
COMMENTS Provide a summary of cases dropped from the sample or caseload.			
CONTACT PERSON (Print)	TELEPHONE	EXTENSION	DATE COMPLETED
TITLE/CLASSIFICATION	FAX	EMAIL	

**COUNTY TANF WORK PARTICIPATION RATE
MONTHLY REPORT
WTW 30 (3/06)****INSTRUCTIONS****COMPLETION AND SUBMISSION**

The report form and instructions can be viewed or printed from the California Department of Social Services, Research and Data Reports (RADR) website at <http://www.cdss.ca.gov/research/>.

This report is due 75 days from the last day of the reporting month. Fax or mail reports to:

California Department of Social Services
Data Systems and Survey Design Bureau, MS 9-081
P. O. Box 944243
Sacramento, CA 94244-2430
FAX: (916) 657-2074

If you have questions regarding this report, contact the Data Systems and Survey Design Bureau at (916) 651-8269.

GENERAL INSTRUCTIONS

Enter in the boxes provided near the top of the form the county name and the report month and year.

Enter in the boxes at the end of the form the contact person's name, job title or classification, telephone number, fax number and email address in case there are questions about the report. The contact person may or may not be the person who completed the report. Enter the date the report was completed.

ITEM INSTRUCTIONS**1. All Families meeting work participation requirements (numerator) for each case in Sample or Universe:**

[Cell 1] These are the data elements used to determine if individuals will be counted. Enter the number of All Families cases (excluding Two-Parent SSP cases) that meet Federal work requirements. The number in Item 1 (Cell 1) will be the numerator in the work participation rate calculation. For a case to be included, it must meet the following conditions:

- a) The family must be included in the work participation rate calculation denominator (see Item 2 below).
- b) One aided adult or minor head of household must participate an average of 30 hours per week.
 - o For a single parent with a child under the age of 6 years, the requirement is 20 hours per week.
 - o A married or single head of household under 20 years old, without a high school diploma or its equivalent, counts as engaged in work in a month if he or she maintains satisfactory attendance at a secondary school or the equivalent or participates in education directly related to employment for an average of at least 20 hours per week.

ITEM INSTRUCTIONS (Continued)

The work activities described in (i) through (ix) below may be used to meet these participation requirements.

- i) Unsubsidized employment.
- ii) Subsidized private-sector employment.
- iii) Subsidized public-sector employment.
- iv) Work experience.
- v) On the job training.
- vi) Job search and job readiness assistance.
 - (1) Maximum of six weeks may be counted in any Federal Fiscal Year (FFY) per individual.
 - (2) Maximum of four consecutive weeks in any FFY per individual.
 - (3) Not more than once during a FFY, a county may count three or four days of job search and job readiness assistance during a week as a full week of participation.
- vii) Community service programs.
- viii) Vocational education training.
 - o Vocational education training may only count for a lifetime total of twelve months for any individual.
- ix) Providing childcare services to an individual who is participating in a Community Service Program.
- c) After at least 20 hours a week in one or more of the activities in b), the following Federal categories may also count as participation:
 - i) Job skills training directly related to employment.
 - ii) Education directly related to employment for individuals with no high school diploma or Certificate of High School Equivalency.
 - iii) Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence.
- d) Not more than 30 percent of all the cases included in the numerator may be deemed as meeting the Federal requirement through:
 - o Participation in vocational education training, or
 - o Maintaining satisfactory attendance at a secondary school or the equivalent or participating in education directly related to employment for an average of at least 20 hours per week.
- e) Calculation of work participation hours

Average number of hours per week: To calculate the average number of hours per week of work activity participation, add the number of hours of participation in the month and divide by the number of weeks (4.33) in a month. Round off to the nearest whole number.

ITEM INSTRUCTIONS (Continued)

2. **All Families not excluded from participation (denominator):** [Cell 2] Enter the number of All Families who must meet the work participation requirement consistent with Federal criteria. The number in Item 2 (Cell 2) will be the denominator in the work participation rate calculation. For a case to be included, it must meet conditions a) and b) below:
- a) Receives a CalWORKs grant for the month.
 - b) Includes at least one aided adult or minor head-of-household.
 - c) All single custodial parent cases with a child under one year of age that meet the conditions in a) may be disregarded from the denominator (for a lifetime limit per adult of 12 months).
 - o Families that meet the work participation requirements, but would normally be disregarded because of a child under one year of age, may be included in both the numerator and denominator.
3. **Monthly TANF work participation rate (Item 1 divided by Item 2):** [Cell 3] The monthly work participation percentage rate. The work participation percentage rate is equal to the number in Item 1 (Cell 1) of this report (the numerator), divided by the number in Item 2 (Cell 2) of this report (the denominator).

COMMENTS

The county should use this space to provide a summary of all cases dropped from the caseload or the sample for the review month.

**COUNTY WORK PARTICIPATION RATE SAMPLE
FACT SHEET**

Who draws the sample? CDSS Federal Data Reporting and Analysis Bureau.

Which counties must do the reviews and rate calculation? All counties.

Who does the reviews? County staff.

Sample size: The sample size varies by county. The number of cases to be reviewed is calculated to produce a work participation rate with a precision of approximately $\pm 2.00\%$ at the 95% confidence level. The annual sample maximum is about 3,200 cases for large counties and 100% of cases for small counties. See the attached Work Participation Rate Sample Sizes (Attachment 6) table for actual county sample sizes. Counties have the option of reviewing 100% of their cases and using the same findings to calculate their rate.

Sample universe: The sample universe contains cases with aid codes 30, 32, 33, 35, 38, 3E, 3G, 3H, 3L, 3M, 3P, 3R, 3U, and 3W in the sample month. Cases with aid codes 35, 3M, and 3U meet the definition of two-parent families in ACL 99-54, dated August 12, 1999, are not currently part of the Federal work participation rate calculation, and should not be included in the sample. When the sample lists are drawn, every effort will be made to screen out the two-parent SSP cases, but if the county determines during its review that a case on the sample list met the two-parent definition described above, the case should be dropped from the sample. If the county elects to review and submit findings on 100% of its caseload, care should be taken to exclude these cases. Adults who have reached the TANF 60-month time limit continue to receive cash aid until they reach the CalWORKs 60-month time limit. These individuals continue to be required to participate in the CalWORKs Welfare-To-Work (WTW) Program, unless exempt from CalWORKs, and continue to be included in the Federal work participation rate.

Sample source: MEDS file.

Is there an overlap with the Q5 sample? When possible, Q5 cases which meet the All-Families definition will be substituted (on a random replacement basis) for work participation rate sample cases. The number of overlap cases will be very small. These replacement cases will be annotated (e.g., starred) on the lists counties receive.

When is the sample drawn? The sample is drawn on approximately the 24th of the month prior to the sample month.

How will the county receive the sample? The county can choose to receive the sample list via e-mail, fax, or U.S. Mail.

How will the review results be reported? Use the form County TANF Work Participation Rate Monthly Report (WTW 30).

When is the WTW 30 due? It is due 75 days after the end of the sample month.

WORK PARTICIPATION RATE SAMPLE SIZES			
	County FFY 2006 Sample Size for 2.0 Precision at 95% confidence	County FFY 2006 Sample Draw (Oversample for 27% Drop Rate)	Monthly Average Sample Draw
Alameda	2331	3,193	266
Alpine	*	*	*
Amador	*	*	*
Butte	2107	2,886	241
Calaveras	1,048	1,435	120
Colusa	*	*	*
Contra	2271	3,111	259
Del Norte	1523	2,086	174
El Dorado	1515	2,075	173
Fresno	2334	3,198	266
Glenn	1,176	1,610	134
Humboldt	1828	2,504	209
Imperial	2105	2,884	240
Inyo	*	*	*
Kern	2307	3,161	263
Kings	1989	2,725	227
Lake	1543	2,114	176
Lassen	1215	1,664	139
Los Angeles	2391	3,275	273
Madera	1980	2,712	226
Marin	1505	2,061	172
Mariposa	*	*	*
Mendocino	1765	2,418	202
Merced	2220	3,041	253
Modoc	*	*	*
Mono	*	*	*
Monterey	2064	2,828	236
Napa	1,059	1,451	121
Nevada	1,200	1,644	137
Orange	2281	3,124	260
Placer	1791	2,454	204
Plumas	*	*	*
Riverside	2338	3,203	267
Sacramento **	2,365	3,240	270
San Benito	1372	1,880	157
San Bernardino	2362	3,235	270
San Diego	2328	3,189	266
San Francisco	2188	2,997	250
San Joaquin	2305	3,157	263
San Luis Obispo	1719	2,354	196
San Mateo **	1,874	2,567	214
Santa Barbara	2073	2,840	237
Santa Clara	2316	3,172	264
Santa Cruz	1947	2,667	222
Shasta	2002	2,742	228
Sierra	*	*	*
Siskiyou	1571	2,152	179
Solano	2205	3,020	252
Sonoma **	1,922	2,633	219
Stanislaus	2268	3,107	259
Sutter	1575	2,158	180
Tehama	1603	2,196	183
Trinity	*	*	*
Tulare	2288	3,134	261
Tuolumne	1254	1,718	143
Ventura	2168	2,969	247
Yolo	1908	2,614	218
Yuba	1866	2,556	213

* Counties are forecast to have caseloads of less than 100 WPR cases per month. Due to the small caseload size, these Counties will report on 100 percent of their active TANF cases.

** In FY 2004/05 County elected to review and submit findings on 100% of its active TANF caseload.

County Work Participation Rate Contact Sheet

(Please return this form within 30 days from the release of this All County Letter
and any time the information requires updating)

_____ County would like to receive our sample list via (circle one) E-MAIL FAX PAPER

Please send the county work participation rate sample to:

Name: _____ Title: _____ Phone: _____

Department: _____

Address: _____ E-MAIL address: _____

City/State/Zip: _____

The following person(s) is responsible for the collection of the data for calculation of the work participation rate:

Name: _____ Title: _____ Phone: _____

Department: _____

Address: _____ E-MAIL address: _____

City/State/Zip: _____

The county will begin transmitting disaggregated data for calculation of the county work participation rate on _____.

Prepared by: _____ Date: _____

For more information on the use of the CDSS tool or flat file layout, contact Lee Macias (see contact information below).

Return this contact sheet to:

California Department of Social Services
Federal Data Reporting and Analysis Bureau
744 P Street, MS 12-57
Sacramento, CA 95814
Phone: (916) 657-3399 Fax: (916) 653-5404
Attention: Lee Macias